Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Transition from TTY to Real-Time Text Technology	)	CG Docket No. 16-145
	)	
	)	
Petition for Rulemaking to Update the Commission's Rules for Access to Support The Transition From TTY To Real-Time Text Technology, And Petition for Waiver of Rules Requiring Support Of TTY Technology	)	GN Docket No. 15-178

COMMENTS OF VTCSECURE

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VTCSecure LLC ("VTCSecure") is a provider of state of the art, Cloud based, software as a service video, voice and real time text (RTT) service to businesses and government agencies. The video and RTT capabilities of our service offering makes it well suited for businesses and government agencies that would like to offer direct customer support to Deaf consumers using Sign Language (SL). VTCSecure also designed, built, and delivered the ACE APP open source software endpoint to fulfill the Federal Communications Commission's contract for the Video Access Technology Reference Platform.[1] The software includes RTT capability using RFC 4103.

VTCSecure strongly supports the thrust of the NPRM,[2] and urges the Commission to adopt a final rule expeditiously. VTCSecure submits these comments to highlight several points.

First, in response to the Commission's inquiry in paragraphs 95 – 99, there is no reason not to apply the proposed RTT requirements to wireline networks. In fact, failure to apply the RTT requirements to wireline networks would seriously undermine the clearly stated Congressional objectives of functional equivalence and access to advanced communications services.[3] In designing and deploying our software and services using RTT VTCSecure has not encountered any technological barriers that

[1] This disclaimer is required by Contract No. FCC15C0008. The Federal Communications Commission (FCC) has not reviewed or approved any statement in this document for accuracy or validity. The FCC and its employees do not endorse goods or services provided by this firm or any other firm, except as allowed by 5 C.F.R. 2635.702(c)(1)-(2), which do not apply here.

[2] *In the Matter of Transition from TTY to Real-Time Text Technology and Petition for Rulemaking to Update the Commission's Rules for Access to Support Transition From TTY to Real-Time Text Technology, And Petition for Waiver of Rules Requiring Support of TTY Technology,* CG Docket No. 16-145 and GN Docket No. 15-178, Notice of Proposed Rulemaking (rel. Apr. 29, 2016) (NPRM).

[3] *See* 47 U.S.C. §§ 225 and 616.

would prevent wireline networks and devices from successfully providing RTT using RFC 4103. In fact, VTCSecure's experience has been that RTT works equally well on both.

Further, as the Commission noted in paragraph 96 "most businesses, government agencies, and retail establishments continue to rely on wireline services, and having telephone access to such enterprises will be necessary for people with disabilities who rely on text to maintain their independence, privacy, and productivity."[4] The Commission also noted "until such time as RTT is generally implemented on wireline networks as well, the ability to reach wireline telephone numbers using RTT will be limited."[5] These two statements capture well the reality that failure to apply RTT requirements to wireline services will significantly delay the availability of RTT, precisely because the wireless and wireline networks are heavily intertwined in daily use.

The Commission has correctly identified, in paragraphs 106 and 107, that sections 251(a)(2), 255, and 716 of the Communications Act provide clear legal authority to adopt RTT requirements for both wireless and wireline providers. VTCSecure would add that the Commission's recent decision to reclassify both wireless and wireline broadband Internet Access Service as a "telecommunications service" further strengthens the Commission's authority, because the statutory definition of "telecommunications service" is clear that Congress intended the definition to be both competitively and technology neutral by stating that the term applies "regardless of the facilities used."[6]

[4] NPRM at ¶ 96.
[5] *Id.* at note 222.
[6] 47 U.S.C. 153(53).

Second, the Commission should also look to section 251(e)(3) of the Communications Act[7] and the other Acts of Congress mandating access to 911 services.[8] Each of those statutory enactments sought to ensure that 911 service is available on both wireless and wireline networks, regardless of technology, and make clear that the Congressional goal is to ensure effective access to emergency services. VTCSecure notes that the Commission's comments in paragraph 69[9] apply with equal force to IP based wireline networks. Applying RTT requirements to both wireless and wireline networks will enable RTT capabilities will speed the day when all Americans can access 911 services without having to go through an interpreter or use voice communications in situations where speaking might put them in further danger.

Third, VTCSecure would like to highlight and expand upon the mention of the ability to use RTT to "access and operate menu-based automated attendant and interactive voice response (IVR) systems."[10] When combined with speech to text technology, RTT enables persons with disabilities to navigate IVR systems by having speech to text translations of the menu options sent to them in real time, thus allowing deaf or hard of hearing consumers to be able to press the appropriate digit(s) on their keypad quickly enough to send DTMF signals to IVR systems. Here again it is important for the Commission to apply RTT requirements to wireline networks as well as wireless networks, because most IVR systems are accessed over a wireline network connection to government agencies and private businesses.

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[7] 47 U.S.C. § 251(e)(3).
[8] *See* 47 U.S.C. §§ 615 and 615a-1.
[9] NPRM at ¶69.
[10] NPRM at note 150.

Finally, ensuring that both wireless and wireline networks and devices are compatible with RTT will also promote the availability of automated speech to text capabilities. The Commission suggests that hard of hearing consumers might not need to use a relay interpreter if they can use RTT to "supplement incoming voice conversations for difficult-to-understand words."[11] The Commission is correct, however, that the utility of RTT in that scenario will likely be very limited because it will depend entirely on the willingness of the calling party to use RTT to anticipate and spell difficult to understand words, and on the willingness of the hard of hearing called party to ask them to spell words they can't hear or understand. VTCSecure agrees with other commenters that there Is a much greater opportunity to increase the functional equivalence for hard of hearing users if RTT is required for wireless and wireline networks and hard of hearing users are able to access automated speech to text capabilities by default or on demand using RTT.[12]

Respectfully submitted,

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[11] NPRM at 35. *See also* NPRM at 78.
[12] *Id.*